

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

WILLIAM ELLIS,)	CASE NO.: 1:22-CV-00815-SO
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
)	
vs.)	
)	
DET. JEFFREY YASENCHACK, <i>et al.</i>,)	
)	
Defendants.)	
)	

DECLARATION OF DOUG NICHOLS

STATE OF OHIO)	
)	SS:
COUNTY OF CUYAHOGA)	

Doug Nichols, pursuant to 28 U.S.C. § 1746(2), certifies under penalty of perjury that the following is true and correct:

1. My name is Doug Nichols. I have personal knowledge about all of the facts in this declaration.

2. I am a retired K9 Police Officer. I last worked as a law enforcement officer for the City of Cleveland Division of Police, #2454. My canine partner was Hugo. He was a fully trained and certified drug detection dog.

3. I have been to 638 East 127th Street, Cleveland, Ohio, in connection with a drug trafficking investigation by certain officers from the Fifth District Cleveland Department of Police and ATF. Hugo and I were present on May 18, 2020, when those agencies and Cleveland SWAT executed a county search warrant at that address.

4. There were two people in the home when we arrived. Those two people, William Ellis and Melissa Stalker, were both present during the execution of the search warrant.

5. I first went through the house with Captain Kane to ensure the safety of any officers conducting a search. I then led Hugo out of the zone car to do an open-air sniff throughout the first floor of the home.

6. I realized that I forgot Hugo's toy in the zone car to provide him with a reward for his work. Detective Yasenchack went out to my zone car to retrieve it, and gave Hugo's toy to me before we continued the search.

7. Hugo provided alerts in the first floor kitchen on the table and on the counter. I then gave him a reward.

8. I continued to give Hugo the verbal prompts to continue searching for narcotics. I saw Hugo continue to sniff the air. He ran to the upstairs of the home very quickly.

9. I asked another officer to close the door to the marijuana grow room located next to the bathroom so that Hugo could more effectively continue his search for other potential narcotics. Hugo provided an alert in the first bedroom at a set of plastic drawers.

10. I continued to give him verbal prompts to continue searching for narcotics. Hugo and I then entered the master bedroom where he alerted at the nightstand and I rewarded him.

11. Hugo and I exited the master bedroom and then reentered the same room. Hugo was targeting an open closet in the master bedroom. There was a large male's jacket hanging on the outside top of the closet door. I presented Hugo toward the jacket hanging on the door and he alerted. Hugo then jumped up the closet door and knocked the jacket onto the floor.

12. I continued to give him verbal prompts to continue searching for narcotics. Hugo then gave several alerts inside and outside of the room containing several marijuana plants surrounded by heat lamps.

13. I provided Hugo with rewards and we returned to the zone car. I gave Hugo some water and returned to the inside of the home. I showed other officers where Hugo provided alerts.

14. I returned to the upstairs master bedroom. I was joined by Detective Yasenchack inside the master bedroom. I showed Detective Yasenchack the large male's jacket on the floor that Hugo pinpointed. I saw Detective Yasenchack search the jacket. He found inside one of the pockets of the jacket a bag containing a substance that visually appeared to be narcotics.

FURTHER DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and accurate. Executed on the 21st day of August, 2023.


DOUG NICHOLS